

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	x	
	:	
UNITED STATES OF AMERICA	:	<u>SUPERSEDING</u>
	:	<u>INFORMATION</u>
- v. -	:	
	:	S2 18 Cr. 873 (VSB)
RUBEN MORCIGLIO,	:	
a/k/a "El Tribu,"	:	
a/k/a "El Diablo,"	:	
	:	
Defendant.	:	
	x	
- - - - -		

COUNT ONE

(Sex Trafficking)

The United States Attorney charges:

1. In or about the summer of 2016, within the Southern District of New York and elsewhere, RUBEN MORCIGLIO, a/k/a "El Tribu," a/k/a "El Diablo," the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means one and more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, and having had a reasonable opportunity to view such persons, knowing and in reckless disregard of the fact that one and more such persons had not attained the age of 18 years and would be caused to engage in one and more commercial sex acts, to wit, MORCIGLIO recruited, enticed, harbored, transported,

provided, obtained, advertised, and maintained a 15 year old minor victim ("Minor Victim-1"), and caused Minor Victim-1 to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to MORCIGLIO.

(Title 18, United States Code, Sections 1591(a), (b)(2), and 2.)

COUNT TWO

(Sex Trafficking Conspiracy)

The United States Attorney further charges:

2. In or about 2010, within the Southern District of New York and elsewhere, RUBEN MORCIGLIO, a/k/a "El Tribu," a/k/a "El Diablo," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit sex trafficking, in violation of Title 18, United States Code, Sections 1591(a)(1) and (a)(2).

3. It was a part and object of the conspiracy that RUBEN MORCIGLIO, a/k/a "El Tribu," a/k/a "El Diablo," the defendant, and others known and unknown, would and did, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain, by any means persons, and would and did benefit, financially and by receiving anything of value, from participation in a venture which engaged in any

such act, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means, would be used to cause such persons to engage in one and more commercial sex acts, and (2) that one or much such persons had not attained the age of 14, in violation of Title 18, United States Code, Sections 1591(a)(1) and (a)(2).

(Title 18, United States Code, Section 1594(c).)

COUNT THREE

(Sex Trafficking Conspiracy)

The United States Attorney further charges:

4. In or about the fall of 2017, within the Southern District of New York and elsewhere, RUBEN MORCIGLIO, a/k/a "El Tribu," a/k/a "El Diablo," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit sex trafficking, in violation of Title 18, United States Code, Sections 1591(a)(1) and (a)(2).

5. It was a part and object of the conspiracy that RUBEN MORCIGLIO, a/k/a "El Tribu," a/k/a "El Diablo," the defendant, and others known and unknown, would and did, in and affecting interstate and foreign commerce, recruit, entice, harbor,

transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means persons, and would and did benefit, financially and by receiving anything of value, from participation in a venture which engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means, would be used to cause such persons to engage in one and more commercial sex acts, in violation of Title 18, United States Code, Sections 1591(a)(1) and (a)(2).

(Title 18, United States Code, Section 1594(c).)

FORFEITURE ALLEGATIONS

6. As a result of committing the offenses alleged in Counts One, Two, and Three of this Information, RUBEN MORCIGLIO, a/k/a "El Tribu," a/k/a "El Diablo," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), any property, real and personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of the offenses alleged in Counts One, Two, and Three, and any property, real and personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses alleged in Counts One, Two, and Three, or any property traceable to such property,

including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendant personally obtained.

Substitute Asset Provision

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 1594; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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Defendant.

SUPERSEDING
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S2 18 Cr. 873 (VSB)

(18 U.S.C. §§ 1591(a), (b)(2), 1594(c)
and 2.)

GEOFFREY S. BERMAN
United States Attorney
